


IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SYNOPSYS, INC.,	)	
a Delaware corporation,	)	
	)	
Plaintiff and	)	
Counter-Defendant,	)	
	)	
v.	)	C.A. No. 05-701 (GMS)
	)	
MAGMA DESIGN AUTOMATION,	)	
a Delaware corporation,	)	
	)	
Defendant and	)	
Counterclaimant.	)	

**DECLARATION OF KAREN JACOBS LOUDEN**

Karen Jacobs Loudon hereby declares as follows:

1. I am a partner in the law firm of Morris, Nichols, Arsht & Tunnell LLP in Wilmington, Delaware. I serve as Delaware counsel to plaintiff, Synopsys, Inc. ("Synopsys").
2. Midday on March 24, 2006, I received a voicemail message from Magma's Delaware counsel, William Wade, advising that Magma intended to file a motion to amend its answer and counterclaim to add four new patents.
3. Mr. Wade did not identify the additional patents that Magma was seeking to add to the case.
4. Mr. Wade also did not invite a meet and confer. Instead he advised that he assumed that Synopsys would oppose the motion, and asked for confirmation.
5. I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Karen Jacobs Loudon (#2881)

April 7, 2006

**CERTIFICATE OF SERVICE**

I certify that on April 7, 2006 I electronically filed the foregoing Declaration of Karen Jacobs Loudon with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to William J. Wade.

I also certify that copies were caused to be served on April 7, 2006 upon the following in the manner indicated:

**BY HAND**

William J. Wade  
Richards, Layton & Finger  
One Rodney Square  
P.O. Box 551  
Wilmington, DE 19899

/s/ Karen Jacobs Loudon  
Karen Jacobs Loudon (#2881)